## STATE OF NEW HAMPSHIRE DEPARTMENT OF STATE

IN THE MATTER OF:	)
	)
Local Government Center, Inc.;	, )
Government Center Real Estate, Inc.;	)
Local Government Center Health Trust, LLC;	)
Local Government Center Property-Liability Trust,	)
LLC;	)
Health Trust, Inc.;	)
New Hampshire Municipal Association Property-Liability	) Case No.: C-2011000036
Trust, Inc.:	)
LGC – HT, LLC	)
Local Government Center Workers' Compensation	)
Trust, LLC;	)
And the following individuals:	)
Maura Carroll; Keith R. Burke; Paul G. Beecher;	)
Peter J. Curro; April D. Whittaker; Timothy J. Ruehr;	)
Julia A. Griffin; and John Andrews	)
	)
RESPONDENTS	)
	)

## SUBPOENA DUCES TECUM TO TESTIFY AT A DEPOSITION AND TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS

To: David Lang, President
Professional Firefighters of New Hampshire ("PPFNH")
25 Nashua Road, Suite E1
Londonderry, NH 03053

X Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this administrative action about the subject matter requested in Exhibit A, attached.

Place: **Preti Flaherty Beliveau & Pachios, PLLP** Date and Time:

57 North Main Street Concord, NH 03301 X Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: SEE ATTACHED EXHIBIT A.

Date: FEBRUARY 6, 2012

DONALD E. MITCHELL, Esq.

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**Presiding Officer** 

The names, addresses, E-mail addresses, and telephone numbers of the attorneys representing Local Government Center, Inc.; Local Government Center Real Estate, Inc.; Local Government Center HealthTrust, LLC; Local Government Center Property-Liability Trust, LLC; HealthTrust, Inc.; New Hampshire Municipal Association Property-Liability Trust, Inc.; LGC-HT, LLC; Local Government Center Workers' Compensation Trust, LLC; and Maura Carroll, who, on health of these antities, requested this Subposes, area.

on behalf of these entities, requested this Subpoena, are: Brian M. Quirk, NHBA #12526 William C. Saturley, NHBA #2256 PRETI FLAHERTY BELIVEAU & PACHIOS, PLLP PO Box 1318 Concord, NH 03302-1318

Tel.: 603-410-1500 Fax: 603-410-1501 bquirk@preti.com wsaturley@preti.com

PROOF OF SERVICE		
DATE:		PLACE
SERVED		
SERVED ON (PRINT NAME)		MANNER OF SERVICE
ERVED BY (PRINT NAME)		TITLE
	DECLARA	TION OF SERVER
I declare under penalty of per contained in the Proof of Ser	rjury under the laws of the vice is true and correct.	e United States of America that the foregoing information
Executed on		
	DATE	SIGNATURE OF SERVER

## **EXHIBT A**

## **DOCUMENTS TO BE PRODUCED**

The Deponent, David Lang, shall be required to have with him at the designated time, date, and place the following documents:

1. Any and all E-mails and any other written correspondence between the New Hampshire Bureau of Securities Regulation and David Lang and or the Professional Fire Fighters of New Hampshire ("PFFNH") from July 2009 through to the present regarding any of the issues raised in the staff petition filed by the New Hampshire Bureau of Securities Regulation ("BSR") dated September 2, 2011 not otherwise subject to legally recognized privilege and protection.